

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION

GLORIA BRADFORD, Individually
and as Class Representative on Behalf
of All Similarly Situated Persons;
NED BURNETT, JR., Individually and
as Class Representative on Behalf of All
Similarly Situated Persons;
SAMUEL ALEXANDER, Individually
and as Class Representative on Behalf
of All Similarly Situated Persons;
BOOKS ETC., by and through GLORIA
BRADFORD, Class Representative on
Behalf of All Those Similarly Situated;
and STELLA PATRICIA SMITH,
Individually and as Class Representative
on Behalf of All Similarly Situated Persons

PLAINTIFFS

VS.

NO. 4:05-cv-4075

UNION PACIFIC RAILROAD
COMPANY, a Delaware Corporation

DEFENDANT

MOTION FOR ADMISSION PRO HAC VICE

COME NOW Plaintiffs, Gloria Bradford, Individually and as Class Representative on Behalf of All Similarly Situated Persons; Ned Burnett, Jr., Individually and as Class Representative on Behalf of all Similarly Situated Persons; Samuel Alexander, Individually and as Class Representative on Behalf of All Similarly Situated Persons; Books, Etc., by and through Gloria Bradford, Class Representative on Behalf of All Those Similarly Situated; and Stella Patricia Smith, Individually and as Class Representative on Behalf of All Similarly Situated Persons, and for their Motion for Admission Pro Hac Vice of Barry G. Reed and Bradley H. Astrowsky would respectfully show unto the Court as follows:

I.

Barry G. Reed and Bradley H. Astrowsky are attorneys associated with the law firm of

Zimmerman Reed in Scottsdale, Arizona. The law firm address, telephone number, facsimile number, and emails of Barry G. Reed and Bradley H. Astrowsky are as follows:

Barry G. Reed
Zimmerman Reed
14646 North Kierland Blvd., Suite 145
Scottsdale, Arizona 85254
Telephone: 480-348-6400
Telecopier: 480-348-6415
Email: bgr@zimmreed.com

Bradley H. Astrowsky
Zimmerman Reed
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Scottsdale, Arizona 85254
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Telecopier: 480-348-6415
Email: bha@zimmreed.com

II.

Mr. Reed's Arizona state bar number is 020906, and Mr. Astrowsky's Arizona state bar number is 016357.

III.

R. Gary Nutter is a member of the bar of the United States District Court for the Western District of Arkansas who maintains an office in Arkansas for the practice of law with whom the Court and opposing counsel may readily communicate regarding the conduct of the case. Mr. Nutter's address, telephone number, facsimile number, and email are as follows:

R. Gary Nutter
Dunn, Nutter & Morgan, L.L.P.
State Line Plaza, Box 8030
Texarkana, AR 71854-5945
Telephone: 870-773-5651
Facsimile: 870-772-2037
Email: rgnutter@dnmlawfirm.com

Mr. Nutter's Arkansas state bar number is 71058.

IV.

Mr. Reed and Mr. Astrowsky have never been the subject of any disciplinary action by the Arizona Bar Association, or any of the courts of Arizona, nor any other bar association or

state. In addition, Mr. Reed and Mr. Astrowsky have never been the subject of any disciplinary action in any federal court. (Please see attached Affidavits.)

V.

Mr. Reed and Mr. Astrowsky have never been denied admission to the courts of any state or to any federal court.

VI.

Mr. Reed and Mr. Astrowsky are familiar or will become familiar with the rules for the United States District Court for the Western District of Arkansas. Mr. Reed and Mr. Astrowsky further state that they will at all times have R. Gary Nutter, an attorney licensed and admitted to practice in the United States District Court for the Western District of Arkansas, serve as co-counsel and participate in all hearings and the trial of this suit.

VII.

R. Gary Nutter hereby states that he has investigated the backgrounds of Barry G. Reed and Bradley H. Astrowsky and also has discussed the matters contained in this motion with Mr. Reed and Mr. Astrowsky. As a result of the investigation and the discussions set forth herein, R. Gary Nutter finds Barry G. Reed and Bradley H. Astrowsky to be reputable and recommends that they be admitted to practice before this Honorable Court in this lawsuit.

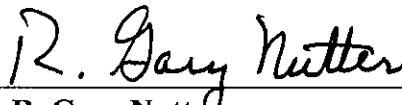
WHEREFORE, PREMISES CONSIDERED, R. Gary Nutter prays that Barry G. Reed and Bradley H. Astrowsky be admitted to practice before this honorable Court as co-counsel for Plaintiffs, Gloria Bradford, Individually and as Class Representative on Behalf of All Similarly Situated Persons; Ned Burnett, Jr., Individually and as Class Representative on Behalf of all Similarly Situated Persons; Samuel Alexander, Individually and as Class Representative on Behalf of All Similarly Situated Persons; Books, Etc., by and through Gloria Bradford, Class Representative on Behalf of All Those Similarly Situated; and Stella Patricia Smith, Individually and as Class Representative on Behalf of All Similarly Situated Persons, in the above styled cause of action.

Respectfully submitted,

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By: 
R. Gary Nutter
ABA#71058

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, R. Gary Nutter, one of the attorneys for Plaintiffs, hereby certify that on the 3rd day of July, 2006, I electronically filed the foregoing Motion for Admission Pro Hac Vice with the Clerk of this Court using the CM/ECF system which will send notification of such filing to the following attorneys:

Attorneys for Defendant:

George L. McWilliams
Sean F. Rommel
Patton Roberts McWilliams & Capshaw
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Texarkana, TX 75503



R. Gary Nutter